

KEY FEDERAL SAVINGS AND LOAN ASSOCIATION
8601 Liberty Road
Randallstown, Maryland 21133

Plaintiff

vs.

WATSON'S BUILDING CONTRACTOR, INC.
c/o Robert D. Osburn, Resident Agent
16 W. Third Street
Frederick, Maryland 21701

PAUL W. WATSON
THELMA WATSON
Route 3, Box 284
Middletown, Maryland 21719

HAROLD J. NIXON, JR.
MARYANN NIXON
46 Cornell Drive
Delran, New Jersey 08075

Defendants

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* IN THE
*
* CIRCUIT COUNTY
*
* FOR
*
* FREDERICK COUNTY
*
* IN EQUITY No. 29,260

PETITION FOR FORECLOSURE


TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Petition of the Plaintiff respectfully represents

That on the 7th day of November, 1978, the Defendants executed and delivered to Key Federal Savings and Loan Association, a mortgage upon real property in the County of Frederick, therein described, to secure the payment of the mortgage debt of \$52,400.00, and interest as therein mentioned, wherein said mortgagors and guarantors assented to the passage of a decree for the sale of said mortgage property, to take place at any time after any default in any covenant or condition of said mortgage; all which all appear from said mortgage, marked "Petitioner's Exhibit No. 1," and filed herewith as part of this Petition. And whereas the mortgagor and guarantors have defaulted under the covenants and conditions contained in said mortgage.

And your petitioner prays that a decree may be passed for the sale of said property in accordance with the terms of said mortgage.

And as in duty, ETC.


GORDON B. HEYMAN
221 Maryland Avenue
Baltimore, Maryland 21218
466-1710

Attorney for Plaintiff

Filed July 19, 1979